

**EXHIBIT A**

**Proposed Order**

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>
<b>COLE SCHOTZ P.C.</b> Stuart Komrower, Esq. Conor D. McMullan, Esq. Court Plaza North, 25 Main Street Hackensack, New Jersey 07601 Telephone: (201) 489-3000 skomrower@coleschotz.com cmcmullan@coleschotz.com  <i>Counsel to the Town of Kearny</i>
In re:  87 JACOBUS AVE, LLC.,  Debtor.

Chapter 11  
Case No. 23-14955 (SLM)  
(Jointly Administered)

**ORDER DESIGNATING 87 JACOBUS AVE, LLC  
AS A SINGLE ASSET REAL ESTATE DEBTOR**

The relief set forth on the following page, numbered two (2), is hereby **ORDERED**.

Upon consideration of the *Motion for Designation of 87 Jacobus Ave, LLC as Single Asset Real Estate Debtor* (the “**Motion**”) filed by the Town of Kearny, along with any papers filed in support of the Motion and any objections thereto; and due and proper notice of the Motion having been given and no other further notice of the Motion being required; and the Court having jurisdiction to adjudicate the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference 12-1*, dated September 18, 2012; and adjudication of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b)(2) for which the Court may enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and all objection to the Motion have been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion and supporting papers establish just cause for the relief granted herein; and upon all the proceedings before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED** that:

1. The real property of 87 Jacobus Ave, LLC is hereby designated as “single asset real estate” as that term is defined in 11 U.S.C. § 101(51B).
2. As of the date of entry of this Order, 87 Jacobus Ave, LLC is hereby designated as a single asset real estate debtor.
3. The Debtor shall comply with the provisions of 11 U.S.C. § 362(d)(3) by thirty (30) days from the date hereof, failing which the automatic stay as to Kearney is vacated as of that date.
4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.